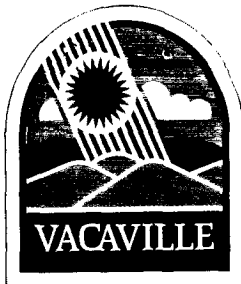


COUNCIL MEMBERS
DAVID A. FLEMING, Mayor
LEN AUGUSTINE, Vice Mayor
PAULINE CLANCY
ERNEST KIMME
RISCHA SLADE



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JUN 29 1998

CITY OF VACAVILLE

650 MERCHANT STREET, VACAVILLE, CALIFORNIA 95688

ESTABLISHED 1850

June 24, 1998

Mr. Lester Snow, Executive Director
CALFED Bay-Delta Program
1416 Ninth Street, Suite 1155
Sacramento, CA 95814

Attention: Rick Breitenbach

SUBJECT: City of Vacaville Comments on the Draft Programmatic Environmental Impact Statement/Environmental Impact Report for the CALFED Bay-Delta Program

Dear Mr. Snow:

The City of Vacaville appreciates the CALFED program effort in Bay-Delta stakeholder participation and the opportunity for input to the revisions of the draft Programmatic Environmental Impact Statement/Environmental Impact Report (EIS/EIR) for the CALFED Bay-Delta Program. As a member of Solano County Water Agency (SCWA) and a North Bay Aqueduct user, the City has worked closely with SCWA to generate comments regarding the draft report. In addition to comments submitted by SCWA, the City offers the following comments regarding water quality, treatment, and water supply reliability and area-of-origins for consideration in revising the draft document.

Water Quality

The 1990 State Water Project Sanitary Survey identified water quality at the North Bay Aqueduct (NBA) as the poorest among the State Water Projects. The Sanitary Survey report identified several drinking water concerns in the NBA watershed requiring consideration of corrective actions including high concentrations of TOC, turbidity, metals, coliform bacteria and pathogens, and THM formation potential.

The water quality impacts of the CALFED alternatives at the NBA drinking water intake are not fully disclosed in the draft Programmatic EIS/EIR. An evaluation of the impacts of the various alternatives and common programs on drinking water supply intakes in the Bay-Delta, including the NBA, should be reviewed and discussed in the revised

DEPARTMENTS: Area Code (707)

Building 449-5152	City Attorney 449-5105	City Manager 449-5100	Finance 449-5117	Fire 449-1838	Personnel 449-5101	Planning 449-5140	Police 449-5200	Public Works 449-5170	Community Services 449-5654
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document. The report should also disclose where water quality program actions, storage, and conveyance do not improve water quality.

Because the NBA has the worst water quality of all the State Water Projects, it is especially important that drinking water quality impacts on the NBA be thoroughly considered by CALFED and fully mitigated. CALFED needs to identify a reasonable level of drinking water standards to be achieved in the State Projects and commit to providing sufficient resources to ensure that all drinking water intakes achieve those minimum standards.

Treatment

When the NBA Contractors are faced with treating water that contains elevated concentrations of TOC, turbidity, metals, coliform bacteria and pathogens, and THM formation potential, severe treatment challenges occur as well as increased costs. At times, water treatment plants treating NBA water shut down or take water from alternative sources due to the poor NBA water quality. Travis AFB, the City of American Canyon, and the City of Benicia have no alternate source and must rely solely on the NBA water. Anticipated future regulations are likely to result in increased treatment problems, requiring costly upgrades to treatment facilities and decrease the ability to use the NBA supply unless the CALFED program provides improvements.

As a long-term solution to water quality problems in the Bay-Delta, CALFED should consider the water quality impacts of the alternatives to all drinking water users. The City of Vacaville recommends CALFED evaluate the feasibility of providing a second intake for the NBA to improve drinking water quality and provide operational flexibility. CALFED should also fund water quality improvement projects in the Barker Slough watershed since watershed management is an important method of controlling contaminants at the source, thus improving water quality.

Water Supply Reliability and Area-of-Origins

The CALFED Bay-Delta Program was established to reduce complex conflicts in the system by solving problems including water supply reliability. CALFED acknowledges that water holds its highest value during periods of short supply and that the most intense conflicts regarding availability occur during periods of shortage (dry years). It is our understanding that during dry years, 65% of the Delta water supply is exported. CALFED implementation of Program elements should seek to avoid water supply conflicts and to preserve the water rights of those in the area-of-origins. The State law provides that "watersheds of origin" shall not be deprived of water needs for economic development due to operation of the Federal Central Valley Project or of the State Water Project. The City of Vacaville is within the watershed-of-origins for the Sacramento River and has filed for a watershed-of-origin water rights permit. The City's 1990 General Plan shows a need for 10,000 to 12,000 acre-feet of additional water at General Plan buildout. The City of Vacaville requests CALFED support Vacaville's

area-of-origins water rights and seek to reduce conflicts of water supply with a clear statement of intent to preserve area-of-origins water rights.

Please consider these comments in addition to those submitted by SCWA, for revisions to the draft document. Should you require additional information or have any questions, please phone David Tompkins at 707/449-6263.

Sincerely,

 FOR

Dale Pfeiffer
Director of Public Works

cc: Helen Thomson, Assemblywoman—8th District
John Thompson, City Manager—City of Vacaville
David Okita, General Manager Solano County Water Agency
David Tompkins, Assistant Director of Public Works—Utilities
File 206-9

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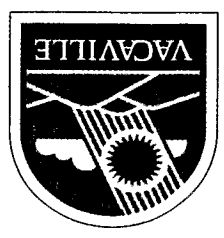
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MR LESTER SNOW, EXECUTIVE DIRECTOR
CALFED BAY-DELTA PROGRAM
1416 NINTH STREET SUITE 1155
SACRAMENTO CA 95814

JUN 29 1998

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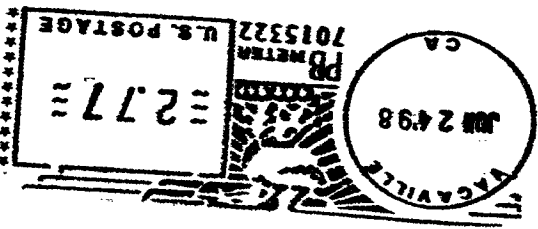
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650 MERCHANT STREET
VACAVILLE, CALIFORNIA 95688



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